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Attorneys for Plaintiff, Hoan Pham

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
(San Jose Division)

HOAN PHAM,)	Case No. C13-01843 HRL
)	
Plaintiff,)	STIPULATION TO MODIFY CASE
)	MANAGEMENT ORDER AS TO
v.)	FACT DISCOVERY CUTOFF;
)	ORDER
REDLINE RECOVERY SERVICES, LLC <i>et</i>)	
<i>al</i> ,)	
)	
Defendants.)	
_____)	

WHEREAS on July 31, 2013, this court issued a Case Management Order
providing for a fact discovery cut-off date of January 28, 2014;

WHEREAS the parties have a mediation scheduled for January 7, 2014;

1 WHEREAS the parties wish to go forward with the mediation prior to conducting any
2 further discovery;

3 WHEREAS the parties are desirous of changing the fact discovery cutoff date to March
4 18, 2014; and,

5 WHEREAS good cause exists to enter an order modifying the fact discovery cutoff date
6 in that it will not effect any other date in the current Case Management Order, including the date
7 of the Pretrial Conference
8

9 IT IS HEREBY STIPULATED by and between all parties to this action through their
10 respective counsel that the fact discovery cutoff date should be reset to March 18, 2014.
11

12
13
14 Dated: December 19, 2014

ALEXANDER COMMUNITY LAW CENTER

15 Scott Maurer /s/
16 Scott Maurer (smaurer@scu.edu)
17 Attorney for Plaintiff HOAN PHAM

18 Dated: _____

GOODMAN NEUMAN HAMILTON LLP

19 James F. Hetherington /s/
20 James F. Hetherington (jhetherington@gnhllp.com)
21 Attorney for Defendant REDLINE RECOVERY
22 SERVICES, LLC

23 Dated: _____

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24 Jessica Luhrs /s/
25 Philip McLeod (philip.mcleod@kyl.com)
26 Jessica Luhrs (jessica.luhrs@kyl.com)
27 Attorneys for Defendant JPMORGAN CHASE
28 BANK, N.A., successor by merger to CHASE
HOME FINANCE LLC

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
(San Jose Division)


HOAN PHAM,)	Case No. C13-01843 HRL
)	
Plaintiff,)	[PROPOSED] ORDER MODIFYING
)	CASE MANAGEMENT ORDER AS
v.)	TO FACT DISCOVERY CUTOFF
)	
REDLINE RECOVERY SERVICES, LLC <i>et</i>)	
<i>al</i> ,)	
)	
Defendants.)	
_____)	

//

~~[PROPOSED]~~ ORDER

PURSUANT TO THE STIPULATION OF THE PARTIES, IT IS HEREBY ORDERED
THAT the Case Managment Order issued July 31, 2013 should be and hereby is modified to
reflect a Fact Discovery Cutoff date of March 18, 2014.
SO ORDERED.

January 13, 2014
~~December __, 2013~~



The Honorable Judge Howard R. Lloyd